

Exhibit 11

Redacted Public Version

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

-ooOoo-

NIKE, INC., :
Plaintiff, :
vs. : No. 1:22-cv-00983-VEC
STOCKX LLC, :
Defendant. :
_____ :

DEPOSITION OF BROCK HUBER
TAKEN THROUGH
ADVANCED REPORTING SOLUTIONS, a Veritext company

Taken on Thursday, June 29, 2023
9:30 a.m. to 12:38 p.m.

At HYATT CENTRIC PARK CITY
3551 North Escala Court
Park City, Utah 84098

Reported by: Abigail D.W. Johnson, RPR, CRR, CRC

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 For the Plaintiff:</p> <p>4 Tamar Y. Duvdevani</p> <p>5 Marc E. Miller</p> <p>6 DLA PIPER</p> <p>7 1251 Avenue of the Americas</p> <p>8 New York, New York 10020-1104</p> <p>9 Tamar.duvdevani@dlapiper.com</p> <p>10 Marc.miller@dlapiper.com</p> <p>11 (212) 335-4799</p> <p>12</p> <p>13 For the Defendant:</p> <p>14 Christopher S. Ford</p> <p>15 DEBEVOISE & PLIMPTON LLP</p> <p>16 650 California Street</p> <p>17 San Francisco, California 94108</p> <p>18 Csford@debevoise.com</p> <p>19 (415) 738-5705</p> <p>20</p> <p>21 For StockX:</p> <p>22 Kevin Adams</p> <p>23 Deputy General Counsel</p> <p>24 StockX</p> <p>25</p> <p>Also Present: McKayla Largin (videographer)</p> <p>-ooOoo-</p>	<p style="text-align: right;">Page 4</p> <p>1 June 29, 2023 9:26 a.m.</p> <p>2 PROCEEDINGS</p> <p>3 -o0o-</p> <p>4 VIDEOGRAPHER: Good morning. We are going</p> <p>5 on the record at 9:26 a.m. on June 29th, 2023. This is</p> <p>6 the media deposition of the 30(b)(6) witness of Brock</p> <p>7 Huber in the matter of Nike, Inc. versus StockX, LLC.</p> <p>8 Case No. 1:22-cv-00983-VEC.</p> <p>9 This deposition is held at the Hyatt in</p> <p>10 Park City, Utah. My name is McKayla Largin. I am the</p> <p>11 videographer, and Abby Johnson is the court reporter.</p> <p>12 Will all counsel state who they represent</p> <p>13 for the record?</p> <p>14 MS. DUVDEVANI: Good morning. Tamar</p> <p>15 Duvdevani, DLA Piper, on behalf of Plaintiff, Nike,</p> <p>16 Inc. I am joined by my partner, Mark Miller, also of</p> <p>17 DLA Piper.</p> <p>18 MR. FORD: Good morning. Christopher Ford,</p> <p>19 Debevoise & Plimpton for StockX, LLC. I am joined by</p> <p>20 in-house counsel for StockX, Kevin Adams.</p> <p>21 Thereupon --</p> <p>22 BROCK HUBER,</p> <p>23 was called as a witness, and having been first duly</p> <p>24 sworn to tell the truth, the whole truth, and nothing</p> <p>25 but the truth, testified as follows:</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX</p> <p>2 EXAMINATIONS PAGE</p> <p>3 Examination By Ms. Duvdevani..... 5</p> <p>4 Examination By Mr. Ford.....95</p> <p>5</p> <p>6 EXHIBITS</p> <p>7 EXHIBIT NO. DESCRIPTION PAGE</p> <p>8 Exhibit 1 Deposition Notice..... 5</p> <p>9 Exhibit 2 Worksheet printout..... 6</p> <p>10 Exhibit 3 Screenshot and video 72</p> <p>11 [STX0806022 and STX0806023]</p> <p>12 Exhibit 4 Screenshot and video 81</p> <p>13 [STX0806003 and STX0806004]</p> <p>14 Exhibit 5 Screenshot and video 82</p> <p>15 [STX0806001 and STX0806002]</p> <p>16 Exhibit 6 Screenshot and video 85</p> <p>17 [STX0806015 and STX0806016]</p> <p>18 Exhibit 7 Screenshot and video 87</p> <p>19 [STX0805999 and STX0806000]</p> <p>20 Exhibit 8 Place holder and video 89</p> <p>21 [STX0806021]</p> <p>22 -o0o-</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 EXAMINATION</p> <p>2 BY MS. DUVDEVANI:</p> <p>3 Q. Good morning, Mr. Huber.</p> <p>4 A. Good morning.</p> <p>5 Q. I'm just going to first mark the deposition</p> <p>6 notice that brings us all back together today.</p> <p>7 (Exhibit No. 1 was marked</p> <p>8 for identification.)</p> <p>9 BY MS. DUVDEVANI:</p> <p>10 Q. Mr. Huber, the court reporter has just</p> <p>11 handed you a document that's been designated as</p> <p>12 Exhibit 1. It is Plaintiff Nike, Inc.'s Amended</p> <p>13 Deposition Notice of Rule 30(b)(6) Deposition to</p> <p>14 StockX, LLC.</p> <p>15 On page 6 and page 7, there are a list of</p> <p>16 deposition topics, which I can represent your counsel</p> <p>17 objected to some of them.</p> <p>18 But do you understand that you are the</p> <p>19 designated witness to testify today pursuant to this</p> <p>20 amended notice?</p> <p>21 A. Yes, I do.</p> <p>22 Q. Okay.</p> <p>23 MS. DUVDEVANI: This is the big --</p> <p>24 MR. FORD: You are just doing it at once?</p> <p>25 MS. DUVDEVANI: Might as well.</p>

<div>Page 34</div> <div>[REDACTED]</div>	<div>Page 36</div> <div>[REDACTED]</div>
<div>Page 35</div> <div>[REDACTED]</div>	<div>Page 37</div> <div>[REDACTED]</div>

<p>Page 50</p> <p>[REDACTED]</p>	<p>Page 52</p> <p>[REDACTED]</p> <p>9 Q. Okay. Earlier on, you had mentioned that</p> <p>10 Derrick told Abe that you were getting 38 products</p> <p>11 back, but you said that only 33 were returned by Roy</p> <p>12 Kim; is that right?</p> <p>13 A. So that was what the -- what I heard</p> <p>14 from -- from Abe. I haven't talked to him. That's</p> <p>15 what I think this sheet shows. I -- I do know that Roy</p> <p>16 told us he was keeping some. Whether he -- so based on</p> <p>17 the sheet and what I heard, it sounds like we received</p> <p>18 33 items.</p> <p>19 We did not receive all 38. I guess there</p> <p>20 is some potential there could be 34 or 35 that we</p> <p>21 received. We didn't receive them all, and he said he</p> <p>22 was keeping some --</p> <p>23 Q. Okay.</p> <p>24 A. -- to us.</p> <p>[REDACTED]</p>
<p>Page 51</p> <p>[REDACTED]</p>	<p>Page 53</p> <p>[REDACTED]</p>

11 Q. Okay. What happened to the other sellers
12 that sold Roy Kim a fake product --

13 A. So --

15 A. So everybody that Mark and team were able,
16 in their analysis, to determine was part of this bad
17 actor group, that seemed to be emanating from a small
18 number of unique devices, was banned.

19 Q. Anybody else?

20 A. No. I think outside of the folks who are
21 connected to the fraud ring, there wasn't anything that
22 looked like egregious, intentional abuse of the
23 platform.

24 Q. Are you aware, looking at the Copy of
25 Referenced Social Media worksheet, which of the sellers

19 MS. DUVDEVANI: Let's go off the record
20 while I pull it up. I don't want to waste my time.

21 VIDEOGRAPHER: Off the record. The time is
22 11:12.

23 (Recess was taken.)

24 VIDEOGRAPHER: We are back on the record.
25 The time is 11:13.

1 REPORTER'S CERTIFICATE

2 STATE OF UTAH)

)

3 COUNTY OF SALT LAKE)

4 I, ABIGAIL D.W. JOHNSON, a Certified
5 Shorthand Reporter and Registered Professional
6 Reporter, hereby certify:

7 THAT the foregoing proceedings were
8 taken before me at the time and place therein set
9 forth, at which time the witness was placed under oath
10 to tell the truth, the whole truth, and nothing but the
11 truth; that the proceedings were taken down by me in
12 shorthand and thereafter my notes were transcribed
13 through computer-aided transcription; and the foregoing
14 transcript constitutes a full, true, and accurate
15 record of such testimony adduced and oral proceedings
16 had, and of the whole thereof.

17 I FURTHER CERTIFY that I am not a
18 relative or employee of any attorney of the parties,
19 nor do I have a financial interest in the action.

20 () Review and signature was requested.

21 () Review and signature was waived.

22 (X) Review and signature was not requested.

23 I have subscribed my name on this

24 6th day of Jul 

25

ABIGAIL D.W. JOHNSON, RPR, CRR, CRC